

**BOULT  
CUMMINGS  
CONNERS  
& BERRY** PLC

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@bccb.com

LAW OFFICES  
414 UNION STREET, SUITE 1600  
POST OFFICE BOX 198062  
NASHVILLE, TENNESSEE 37219

March 31, 2000

REC'D TN  
REGULATORY AUTH.

00 MAR 31 PM 12 06

TELEPHONE (615) 244-2582  
FACSIMILE (615) 252-2380  
EXECUTIVE INTERNET WEB <http://www.bccb.com/>

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

**In Re: Complaint of Discount Communications against BellSouth  
Telecommunications  
Docket No. 00-00230**

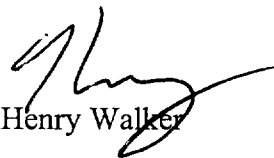
Dear David:

Please accept for filing the original and thirteen copies of Discount Communications, Inc.'s preliminary issues list in the above-captioned proceeding.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

  
Henry Walker

HW/nl

c: Patrick Turner, counsel for BellSouth Telecommunications

**POSTED**  
4-4-00

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

IN RE: COMPLAINT OF DISCOUNT       )  
COMMUNICATIONS, INC.                )     Docket No. 00-00230  
AGAINST BELL SOUTH                 )  
TELECOMMUNICATIONS, INC.         )

---

**PRELIMINARY ISSUES LIST OF DISCOUNT COMMUNICATIONS**

---

The following is a preliminary list of issues to be resolved in the above-captioned proceeding. Additional issues may develop through discovery, the filing of pre-hearing briefs, and the hearing itself.

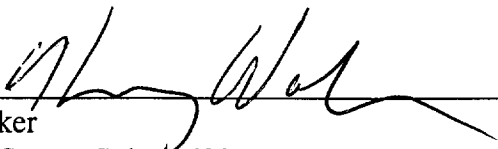
1. Whether BellSouth has properly charged, and may continue to charge, Discount Communications for directory assistance.
2. Whether BellSouth has properly credited Discount Communications for providing service to Lifeline customers and how BellSouth will provide such credits in the future.
3. Whether BellSouth has properly credited Discount Communications for providing service to Link Up customers and how BellSouth will provide such credits in the future.
4. Whether BellSouth has engaged in a pattern of anti-competitive activity toward Discount Communications, as evidenced by the three matters described above and by other

incidents of anti-competitive behavior.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: \_\_\_\_\_

  
Henry Walker  
414 Union Street, Suite 1600  
P.O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded via hand delivery, to Patrick Turner, Esq., BellSouth Telecommunications, Inc., 333 Commerce St. , Nashville, TN 37201-3300 on this the 31st day of March, 2000.

\_\_\_\_\_  
Henry Walker